

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
Telecommunications Industry Association -	)	
In the Matter of Request for the Allowance	)	RM 11673
of Optional Electronic Labeling for	)	
Wireless Devices	)	

**COMMENTS OF NOKIA INC.  
IN SUPPORT OF PETITION FOR RULEMAKING**

**I.     INTRODUCTION**

Pursuant to section 1.405(a) of the Commission's rules,<sup>1</sup> Nokia Inc. (Nokia) submits these comments in support of the above-captioned Petition for Rulemaking (Petition) filed by the Telecommunications Industry Association (TIA) on August 6, 2012 and placed on Public Notice by the Commission on September 5, 2012.<sup>2</sup> Nokia is a global leader in mobile communications whose products have become an integral part of the lives of people around the world. Every day, more than 1.3 billion people use their Nokia to capture and share experiences, access information, find their way or simply to speak to one another. Nokia's technological and design innovations have made its brand one of the most recognized in the world. As a leader in design innovation for mobile devices, Nokia has a direct interest in this issue and urges the Commission to initiate a rulemaking proceeding to modify its rules to explicitly permit electronic labeling for mobile devices.

**II.    DISCUSSION**

As explained in the Petition, electronic labeling would have significant benefits for consumers, manufacturers and regulatory authorities.

---

<sup>1</sup> 47 C.F.R. § 1.405(a).

<sup>2</sup> *Public Notice*, Report No. 2960, (Sept. 5, 2012).

Nokia agrees with TIA that it is unlikely that most consumers are either aware of or understand the meaning of regulatory information contained on a label or etched on to the exterior of their devices. While current practices such as placing the regulatory markings on a label behind a removable battery or etching them on to the exterior of a device might meet the minimal technical requirements of the Commission and other regulators for product certification, in reality they do very little to provide any useful information to consumers and only increase costs and manufacturing challenges for manufacturers. Electronic labeling would provide consumers with much more meaningful access to and explanation of required regulatory information than is available under the current labeling rules. Moreover, industry standardization efforts are going on that will provide a uniform, prominent and recognizable method for consumers and regulatory authorities to be able to easily access important regulatory and product information. This, combined with the technical capabilities of modern mobile devices, would allow important regulatory and other product information to be provided with context and explanation to consumers. Consumers will be much more likely to understand what the information means and unlike information currently provided in printed user guides and product manuals which are rarely looked at and are often not kept by consumers, this information would always be available to consumers on their devices.

Electronic labeling would also provide significant benefits to manufacturers in terms of reduced costs, increased design freedom and logistical and production flexibility. As noted in the Petition, electronic labeling would provide manufacturers with significant freedom to design and develop more innovative form factors using new materials that consumers desire. Legacy regulatory marking requirements should not dictate design decisions by manufacturers, especially when a far more effective means of conveying important regulatory information to consumers is readily available. Manufacturers would also save costs and production time by not being required to dedicate resources and equipment to physically labeling or etching devices in the factory. In addition, electronic labeling would provide manufacturers with increased logistical flexibility, allowing devices to be quickly programmed or re-

programmed to accommodate the regulatory disclosure requirements for any country or region where they might be shipped, without the need to physically re-label or, even worse re-etch the devices, both of which can be time-consuming, wasteful and costly.

Nokia notes that the Petition acknowledges that electronic labeling may raise some minor concerns in rare instances. In particular, TIA notes that in the absence of physical labels, it may be difficult to ascertain product information for non-working devices in the event of a product recall or other instance where such information is needed. Nokia agrees with TIA that the manufacturer name and model number on the device would generally be an effective way for a consumer to identify its device and that a device registration system could also effectively address this issue. Overall Nokia believes that these and other challenges that may be identified can be easily overcome and are outweighed by the significant benefits that e-labeling would bring.

### **III. CONCLUSION**

For the foregoing reasons and for the reasons explained in the Petition, the Commission should grant TIA's request and initiate a rulemaking proceeding to explicitly permit electronic labeling of mobile devices. Nokia looks forward to working with the Commission and other interested parties to ensure that electronic labeling will be implemented in a manner that results in increased information and convenience for consumers and regulatory authorities while providing manufacturers with increased design freedom, logistical and production flexibility and reduced costs.

Respectfully submitted,

**Nokia Inc.**

By: /s/ Leo R. Fitzsimon

Head of Government & Industry Affairs  
Nokia Inc.  
1401 K Street, NW  
Suite 450  
Washington, DC 20005  
(202) 887-0145

Dated: October 5, 2012